

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
GEORGE HENRY SIMEONE	:	
fdba George Simeone's 100 Hour Mega	:	CASE NO. 1:17-bk-04682
Sale	:	
Debtor	:	
	:	
SPECIALIZED LOAN SERVICING, LLC	:	
AS SERVICER FOR THE BANK OF NEW	:	
YORK MELLON F/K/A THE BANK OF	:	
NEW YORK AS TRUSTEE FOR THE	:	
CERTIFICATEHOLDERS OF THE	:	
CWABS, INC. ASSET-BACKED	:	
CERTIFICATES, SERIES 2006-18	:	
Movant	:	
	:	

V.

GEORGE HENRY SIMEONE
fdba George Simeone's 100 Hour Mega
Sale
Respondent

OBJECTION TO CERTIFICATE OF DEFAULT

Debtor's counsel received a Notice of Default from National Bankruptcy Services on behalf of Specialized Loan Servicing and had attempted to reach them with regard to a payment that had been returned to the Debtor as well as other questions the Debtor had concerning the alleged default and requested that they not file a Certificate of Default until the issues were clarified; however, National Bankruptcy Services never responded and the mortgagee filed a Certificate of Default through Attorney Ebeck of Bernstein Law.

The undersigned has now reached out to Attorney Ebeck to resolve those issues and requests that the Court not enter an Order granting relief until Attorney Ebeck and the undersigned have had an opportunity to discuss the matter.

WHEREFORE, the Debtor respectfully requests that this Court deny the Certificate of Default Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com